

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

RYAN MILLIRON,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
DEFENSE,

Defendant.

Civil Action No. 1:23-cv-1222

Hon. Robert J. Jonker
U.S. District Judge

Hon. Phillip J. Green
U.S. Magistrate Judge

EXHIBIT 3
Affidavit of Voreas Laboratories



Freedom of Information Act Request

Case No. 23-F-1597

Affidavit of Voreas Laboratories LLC

In response to a request by Defense Advanced Research Projects Agency (DARPA) pursuant to the above referenced Freedom of Information Act (FOIA) request, Voreas Laboratories LLC (VLI) offers the following explanation for redactions of the information due to the commercialization aspect of the technology contained in the requested documents.

Georgia Institute of Technology (GT) licensed the technology through a government contract known as Enhanced Attribution (EA). EA involved the collection of statistical features that were assembled into a proprietary algorithm that was ultimately licensed to GT by VLI.

The technical documents sought by the FOIA request is an analysis of the interplay between public source information and raw data that provides a roadmap to the proprietary algorithm and if disclosed, would permit a third party, particularly a foreign intelligence agency to “reverse engineer” the features, data sources and overall algorithms licensed from GT.

It is necessary that appropriate redactions preserve the propriety materials contained in the document or the technology’s commercialization will be irreparably compromised.

Redaction Basis One - Revealing a statistical feature, making it effectively discoverable by others, these redactions are found on pages 13, 14, 22, 40.

Redaction Basis Two - Revealing explicit (private or public) data sources used by the technology, jeopardizing the pollution and invalidation of the statistical features used by the attack, these redactions are found on pages 3, 4, 17, 19, 20, 23-39, 41-42.



Redaction Basis Three - Revealing the description of or the explicit mention of an algorithm we planned at the time to use in the making of the technology, these redactions are found on pages 4, 20, 41-42.

Pages 5 – 12, 15 – 16, 18, 21 require redaction for Basis One, Basis Two and Basis Three.

If the necessary redactions are not made, the technology licensed from GT will be made useless in a commercial setting as it can no longer be treated as a corporate secret and will permit those who are hostile to the United States access to the proprietary information which can then be utilized by hostile actors.